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Attorney for Defendant Petrille

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA (HARRISBURG)

DEB WHITEWOOD, et al.,

Plaintiffs,

vs.

THOMAS W. CORBETT, in his
official capacity as Governor of
Pennsylvania, et al.,

Defendants.

Case No. 13-cv-01861-JEJ

(Honorable John E. Jones, III)

DEFENDANT'S INITIAL
RULE 26(a)(1)(A)
DISCLOSURES

COMES NOW the Defendant, Donald Petrille, Jr.

(hereinafter "Defendant Petrille"), by and through his undersigned
counsel, and herewith submits his Initial Disclosures pursuant to
Fed. R. Civ. P. 26(a)(1)(A).

A. The name and address of each individual likely to have discoverable information that Defendant may use to support its claims:

1. The parties to this matter.
2. Such other witnesses that may be identified.

Colleen Strunk

Lisamarie Lewendowski

55 E. Court Street, Doylestown, PA 18901

Defendant Petrille reserves the right to amend these Disclosures throughout the course of discovery until the date of trial.

B. Documents in the possession, custody, or control of Defendant Petrille which he may use to support his claims and/or defenses herein:

1. Correspondence to individuals who inquired of the office regarding marriage licenses in contravention of 20 Pa. C.S.A. § 1704.

Defendant Petrille reserves the right to amend these Disclosures throughout the course of discovery until the date of trial.

C. Calculation of Damages

Defendant Petrille denies any claim for damages or recovery by the Plaintiffs herein. Defendant Petrille was at all times in full compliance with applicable law and had no discretion

to deviate therefrom in the issuance of marriage licenses, which under Pennsylvania law is a ministerial act. *Miller's Estate*, 34 Pa. Super. 385 (1907) (rejecting proposition that issuance of marriage licenses allows discretion in granting or denying marriage licenses). Defendant Petrille reserves the right to amend these Disclosures throughout the course of discovery until the date of trial.

Respectfully submitted,

s/Nathan D. Fox
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*Attorney for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of September, 2013, I caused to be served a true and correct copy of the foregoing Defendant's Initial Rule 26(a)(1)(A) Disclosures upon each of the following individuals by U.S. First-Class Mail, with a courtesy copy by electronic mail delivery, at the addresses listed below:

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*Attorneys for Mary Jo Poknis, Register of Wills of Washington
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and I further certify that I have caused the foregoing document to
be served by U.S. First-Class Mail on the following non-ECF
participant:

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